

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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Daniella Muratov, *on behalf of herself and others*
similarly situated in the proposed FLSA
Collective Action,

Case No.: 22-cv-03785-HG

Plaintiff,

NOTICE OF MOTION

- against -

Mama Shnitzel Inc., Mamas Grill Inc., and Mike
Mirzacandov (a/k/a Mike Mirz),

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated December 8, 2022, together with the supporting declaration of Jason Mizrahi, Esq. and the exhibits annexed thereto, Plaintiff Daniella Muratov (“Plaintiff”), by and through the undersigned counsel, Levin-Epstein & Associates, P.C., will move this Court, the Honorable Judge Hector Gonzalez, at the United States District Court of the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, for an order: (i) entering default judgment against Defendants Mama Shnitzel Inc., Mamas Grill Inc., and Mike Mirzacandov pursuant to Federal Rule of Civil Procedure (“Fed.R.Civ.P.”) 55(b), of \$1,253.57 in unpaid minimum wages, \$1,253.57 in liquidated damages, \$6,500 in statutory damages under the WTPA, \$5,687.50 in attorneys’ fees, and \$635.50 in costs; and (ii) awarding prejudgment interest on Plaintiff’s unpaid wages award of \$1,253.57, in an amount to be determined by the Clerk of Court, by multiplying \$.31 by the number of days from May 16, 2022 until the day final judgment is entered against Defendants; (iii) together with such other relief as this Court deems just and proper;

PLEASE TAKE FURTHER NOTICE that answering and reply papers, if any, must be served by such date that the Court may order.

Dated: New York, New York
December 8, 2022

By: /s/ Jason Mizrahi
Jason Mizrahi, Esq.
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Cc: All parties via ECF